

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

SOPC HOLDINGS EAST LLC,)	
the Tax Matters Partner of)	
MOTIVA ENTERPRISES LLC,)	
)	
Plaintiff,)	CIVIL ACTION No. 4:21-cv-01888
v.)	
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	

PLAINTIFF’S UNOPPOSED MOTION TO DISMISS

Plaintiff SOPC Holdings East LLC, the Tax Matters Partner of Motiva Enterprises LLC, respectfully moves under Federal Rules of Civil Procedure 41(a)(2) and L.R. 7.2 to dismiss this matter and in support thereof states the following:

Plaintiff filed a Complaint on June 10, 2021. ECF No. 1. The Defendant has not filed an Answer or a responsive pleading in this matter. Proceedings in this case are currently stayed. ECF No. 18.

The Plaintiff respectfully requests the court to dismiss the Complaint without costs taxed to any party.

The Defendant does not oppose this motion to dismiss.

Date: January 10, 2023

Respectfully Submitted,

/s/ Kevin L. Kenworthy

Kevin L. Kenworthy (D.C. Bar No. 414887)

So. Dist. of Tx. Fed. ID No: 3385412

George A. Hani (D.C. Bar No. 451945)

So. Dist. of Tx. Fed. ID No. 3385399

Andrew L. Howlett (D.C. Bar No. 1010208)

So. Dist. of Tx. Fed. ID No. 3385407

Attorneys-in-Charge

Miller & Chevalier Chartered

900 16th Street NW

Washington, DC 20006

Tel. (202) 626-5800

Fax. (202) 626-5801

Email: kkenworthy@milchev.com

Email: ghani@milchev.com

Email: ahowlett@milchev.com

Attorney for Plaintiffs

SOPC Holdings East, LLC

the Tax Matters Partner of Motiva

Enterprises LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon all counsel of record through ECF system on January 10, 2023.

KARI M. LARSON
Senior Litigation Counsel
Tax Division
U.S. Department of Justice
P.O. Box 403
Washington, D.C. 20044
Telephone: 202-626-3822
Facsimile: 202-307-2504
E-mail: Kari.M.Larson@usdoj.gov

/s/ Kevin L. Kenworthy

Kevin L. Kenworthy